

1 Lauren E. Grochow (SBN 293601)
2 lauren@grochowlaw.com
3 Kevin J. Grochow (SBN 288586)
4 kevin@kjgtriallawyers.com
5 Daniel M. Kalinowski (SBN 305087)
6 daniel@grochowlaw.com

7 Grochow law, a Professional Corp.
8 33 Brookline
9 Aliso Viejo, CA 92656
10 Telephone: (949) 506-1494

11 Attorneys for Plaintiff-Relator
12 Jonathan Faulkner

13 UNITED STATES DISTRICT COURT
14
15 NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION
16

17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 *Ex. rel.*

20 JONATHAN FAULKNER,

21 Plaintiff-Relator.

22 v.

23 THE BOARD OF TRUSTEES OF THE
24 LELAND STANFORD JUNIOR
25 UNIVERSITY,

26 Defendant.

Case No. 20-cv-00636-VKD

**FRCP RULE 41 STIPULATION FOR
DISMISSAL WITH PREJUDICE AND
ORDER THEREON**

STIPULATION

27 WHEREAS, Plaintiff-Relator JONATHAN FAULKNER ("Plaintiff-Relator"), wishes to
28 dismiss this action with prejudice in exchange for a waiver of collectible costs by Defendant THE
BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY
("Defendant");

WHEREAS, Defendant is willing to accept said dismissal by Plaintiff-Relator with

1 prejudice and is willing to waive all costs in exchange;

2 WHEREAS, Plaintiff the UNITED STATES OF AMERICA ("Plaintiff") has advised that
3 it will consent to the dismissal of Defendant so long as the dismissal is without prejudice as to
4 Plaintiff only;

5 WHEREAS, Defendant is willing to accept that said dismissal is without prejudice as to
6 Plaintiff only.

7 THEREFORE, IT IS STIPULATED by and between the parties hereto through their
8 respective counsel that pursuant to Federal Rules of Civil Procedure Rule 41(a) this matter be
9 dismissed pursuant to the terms outlined above and with permission of the Court.

10
11 Dated: February 2, 2025

12
13 
14 Plaintiff-Relator
Jonathan Faulkner

15 Dated: February 2, 2025

GROCHOW LAW

16
17
18 Lauren E. Grochow
19 Daniel M. Kalinowski
Kevin J. Grochow

20 Attorneys for Plaintiff-Relator
Jonathan Faulkner

21
22 Dated: February 2, 2025

BLANK ROME LLP

23
24 Cheryl S. Chang
25 Dominique L. Casimir
26 Luke W. Meier
27 Attorneys for Defendant
The Board of Trustees of the Leland
Stanford Junior University

1 prejudice and is willing to waive all costs in exchange;

2 WHEREAS, Plaintiff the UNITED STATES OF AMERICA ("Plaintiff") has advised that
3 it will consent to the dismissal of Defendant so long as the dismissal is without prejudice as to
4 Plaintiff only;

5 WHEREAS, Defendant is willing to accept that said dismissal is without prejudice as to
6 Plaintiff only.

7 THEREFORE, IT IS STIPULATED by and between the parties hereto through their
8 respective counsel that pursuant to Federal Rules of Civil Procedure Rule 41(a) this matter be
9 dismissed pursuant to the terms outlined above and with permission of the Court.

10 Dated: February 2, 2025

11 _____
12 Plaintiff-Relator
Jonathan Faulkner

13 Dated: February 2, 2025

GROCHOW LAW

14 _____
15 s/ Kevin J. Grochow
16 Lauren E. Grochow
Daniel M. Kalinowski
Kevin J. Grochow
Attorneys for Plaintiff-Relator
Jonathan Faulkner

17 Dated: February 2, 2025

BLANK ROME LLP

18 _____
19 s/ Cheryl S. Chang
20 Cheryl S. Chang
Dominique L. Casimir
Luke W. Meier
Attorneys for Defendant
The Board of Trustees of the Leland
Stanford Junior University

21 In accordance with Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all of the
22 signatories listed on this Stipulation, and on whose behalf this stipulation is
23 submitted, concur in the Stipulation's content and have authorized its filing.

24 _____
25 s/ Kevin J. Grochow
26

ORDER

PURSUANT TO STIPULATION OF THE PARTIES AND GOOD CAUSE
APPEARING THEREFOR, IT IS ORDERED that the above-entitled action and Defendant
named in the First Amended Complaint on file herein is dismissed with prejudice as to Plaintiff-
Relator Jonathan Faulkner, and without prejudice as to Plaintiff the United States of America,
pursuant to Federal Rules of Civil Procedure Rule 41(a).

Dated:

Virginia K. DeMarchi
United States Magistrate Judge